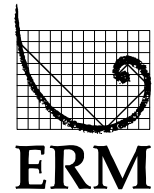


# Draft Memorandum

Environmental  
Resources  
Management, Inc.

77 Hartland Street, Suite 300  
East Hartford, CT 06108

(860)-466-8500  
(860)-466-8501 Fax



To:	Marilyn St. Fleur – EPA New England
From:	Robert J. Drake, PE, Ph.D., LEP
CC:	Andrew N. Davis, Ph.D. – Dewey & LeBoeuf LLP Gennady Shteynberg – CT DEP
Date:	September 30, 2010
Subject:	<b>Summary of PCB Remediation (AOC-8)</b> <b>Former IntelliData Facility</b> <b>80 Pickett District Road, New Milford, Connecticut</b> <b>ERM Project No. 0116794</b>

## Remediation Summary:

### *Delineation of Release Area*

On August 14, 2010 ERM conducted a soil sampling effort designed to complete the delineation of the previously identified release of polychlorinated biphenyls (PCBs) in soils surrounding the on-site transformer owned by Connecticut Light & Power (CL&P) located in AOC-8. As part of this effort, ERM collected soil samples inside and outside of the fenced-in enclosure surrounding the CL&P-owned transformer. (The highest PCB concentration identified during the initial testing conducted between 2001 and 2004 (1.3 parts per million (ppm)) was reported from just outside the fenced-in enclosure.)

The August 14, 2010 sampling effort included the collection of ten (10) soil samples in AOC-8 as depicted on the attached “Figure 1 – AOC-8 Pad Mounted Transformer Sample Locations and Excavation”. These samples were collected and analyzed in accordance with the revised Quality Assurance Project Plan (QAPP) with analysis conducted by Spectrum Analytical of Agawam, Massachusetts. The results of the analyses, summarized in “Table 1 – AOC-8 Soil Analysis Results,” were compared with the Residential Direct Exposure Criteria for PCBs (1 ppm). Based on the laboratory results:

1. No PCBs were found at concentrations above the 1 ppm remedial criterion within the fenced-in transformer area.
2. No PCBs were found at concentrations above the 1 ppm remedial criterion outside the fenced-in transformer area.

Based on these results, the remedial effort was defined as an excavation to a depth of two (2) feet over the lateral area shown on Figure 1. The excavation was extended to the north to sampling point TR-12A where PCBs were detected at a concentration of 0.428 ppm (i.e., less than one-half the remedial criterion).

#### *Remediation Efforts and Post-Excavation Sampling*

The initial excavation was conducted on August 27, 2010. Soil was stockpiled on and under polyethylene sheeting while awaiting characterization results for disposal.

Post-excavation soil samples were collected at the locations shown on Figure 1. Analysis of the post-excavation soil samples indicated the following:

- Post-excavation samples collected from sidewalls and the bottom of the excavation did not contain PCBs above minimum laboratory detection limits, except for along the southern wall of the excavation (near the fence surrounding the CL&P-owned transformer); and
- The southern post-excavation sample contained PCBs at a concentration of 2.22 ppm (the highest concentration reported within the release area).

Based on these results, ERM performed a second soil excavation along and beneath the northern portion of the fencing surrounding the CL&P-owned transformer. The area of the second soil excavation is identified on Figure 1. ERM collected an additional post-excavation sample on September 20, 2010 from within the area of the second soil excavation. As noted in Table 1, that sample had a PCB concentration (0.126 ppm) well below 1 ppm.

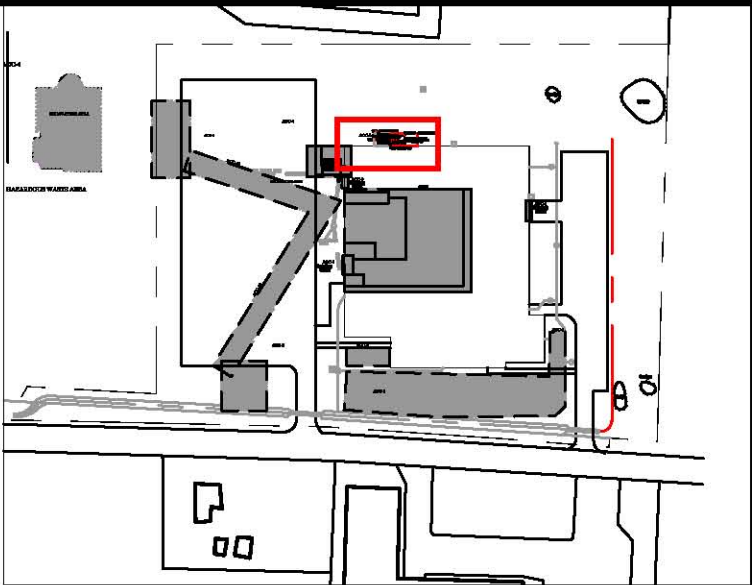
ERM, therefore, determined that the remedial effort at AOC-8 has been successfully concluded. This information will be incorporated into the final remedial action report that ERM will prepare upon the completion of the soil vapor extraction/air sparging remedial effort.

#### *Attachments*

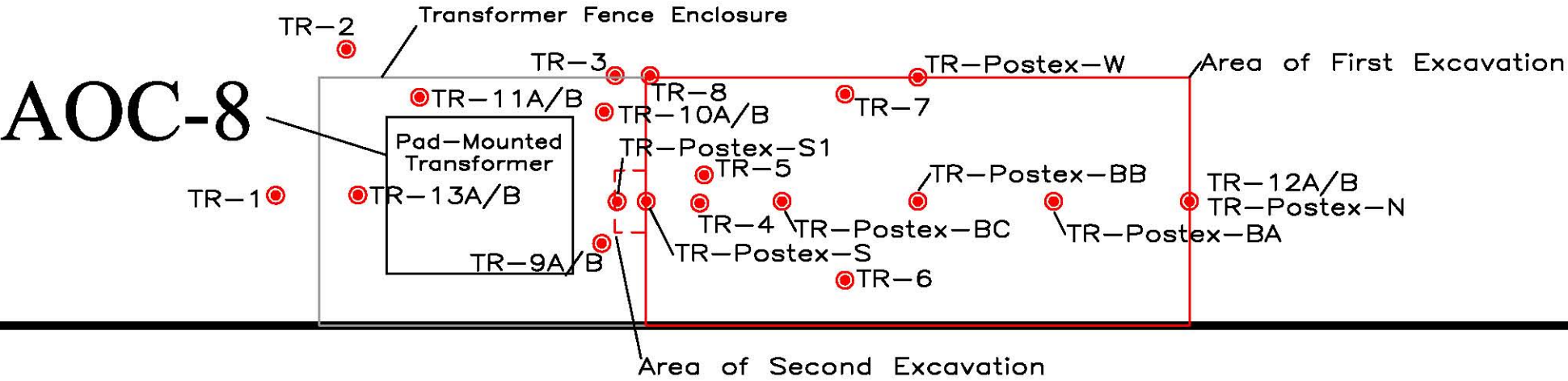
*Figure 1      AOC-8 Pad Mounted Transformer Sample Locations and  
Excavation*

*Table 1      AOC-8 Soil Analysis Results*

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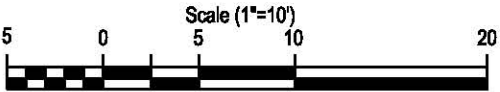


Location Map  
Scale: 1"=250'



**LEGEND**

TR-6 ● PCB Soil Sample Location



**Figure 1 - AOC-8 Pad Mounted Transformer**  
Sample Locations and Excavation  
Intelidata, New Milford, CT



**Table 1: AOC-8 Transformer**  
**Summary of Soil Sample Results**  
 Intelidata  
 New Milford, Connecticut

ERM ID #	RES DEC	I/C DEC	GB PMC	TR-1	TR-2	TR-3	TR-4	TR-5	TR-6A	TR-6B	TR-7A	TR-7B	TR-8B	TR-9A	TR-9B	TR-10A	TR-10B
Date Sampled				5/18/2001	5/18/2001	5/18/2001	5/18/2001	4/27/2004	4/27/2004	4/27/2004	4/27/2004	4/27/2004	4/27/2004	8/14/2010	8/14/2010	8/14/2010	8/14/2010
Lab ID #				AC48155	AC48156	AC48157	AC48158	SA11687-01	SA11687-02	SA11687-03	SA11687-04	SA11687-05	SA11687-06	SB16632-03	SB16632-04	SB16632-05	SB16632-06
Sample Depth				0-6"	0-6"	0-6"	0-6"	>1'	0-1'	>1'	0-1'	>1'	>1'	0.0-0.5'	1.5-2.0'	0.0-0.5'	1.5-2.0'
PCBs (ug/kg)																	
PCB-1254	1,000	10,000	NE	41	ND	ND	1,300	ND	1,020	ND	ND	ND	ND	27.3	ND	45.3	ND

ERM ID #	RES DEC	I/C DEC	GB PMC	TR-11A	TR-11B	TR-12A	TR-12B	TR-13A	TR-13B	TR-Postex-N	TR-Postex-BA	TR-Postex-BB	TR-Postex-W	TR-Postex-S	TR-Postex-BC	TR-Postex-S1
Date Sampled				8/14/2010	8/14/2010	8/14/2010	8/14/2010	8/14/2010	8/14/2010	8/27/2010	8/27/2010	8/27/2010	8/27/2010	8/27/2010	8/27/2010	9/20/2010
Lab ID #				SB16632-07	SB16632-08	SB16632-01	SB16632-02	SB16632-09	SB16632-10	SB-17423-01	SB-17423-02	SB-17423-03	SB-17423-04	SB-17423-05	SB-17423-06	SB18513-01
Sample Depth				0.0-0.5'	1.5-2.0'	0.0-0.5'	1.5-2.0'	0.0-0.5'	1.5-2.0'	0.5'	1.0'	1.0'	0.5'	0.5'	1.0'	1.0'
PCBs (ug/kg)																
PCB-1254	1,000	10,000	NE	ND	ND	428	ND	ND	ND	ND	ND	ND	ND	2,220	ND	126

ND = Not Detected

NT = Not Tested

NE = None Established

Standards = Connecticut Department of Environmental Protection Remediation Standard Regulations numerical criteria

RES DEC = Residential Direct Exposure Criteria

I/C DEC = Industrial/Commercial Direct Exposure Criteria

GB PMC = Pollutant Mobility Criteria for soils in a GB ground water classification area